

DOCUMENTATION OF ENVIRONMENTAL INDICATOR DETERMINATION

RCRA Corrective Action
Environmental Indicator (EI) RCRIS code (CA725)
No Current Human Exposures* EI
("Human Exposures EI")

Facility Name: Ormet-Wah Chang
Facility Address: 1600 NE Old Salem Road, Linn County, Millersburg, Oregon
Facility EPA ID #: ORD 05095 5848

1. Has **all** available relevant/significant information on known and reasonably suspected releases to soil, groundwater, surface water/sediments, and air, subject to RCRA Corrective Action (e.g., from Solid Waste Management Units (SWMU), Regulated Units (RU), and Areas of Concern (AOC)), been **considered** in this EI determination?

XXXX If yes - check here and continue with #2 below.

_____ If no - re-evaluate existing data, or

_____ if data are not available skip to #6 and enter "IN" (more information needed) status code.

Rationale and Reference(s): There is a CERCLA ROD in place which specifically addresses all known groundwater impacts at the facility, and the Oregon Clean-up Program is also heavily involved at the site. In addition, the 1997 RFA compliments the CERCLA information with known above-ground potential releases. All documents associated with these three programs have been reviewed.

2. Is groundwater, soil, surface water, sediments, or air, **media** known or reasonably suspected to be "**contaminated**"¹ above appropriately protective risk-based "levels" (applicable promulgated standards, as well as other appropriate standards, guidelines, guidance, or criteria) from releases subject to RCRA Corrective Action (from SWMUs, RUs or AOCs)?

	<u>Yes</u>	<u>No</u>	<u>?</u>	<u>Rationale / Key Contaminants</u>
Groundwater	XX	___	___	PCE, MIBK, DCE, TCE, TCA, heavy metals, VC
Surface Soil (e.g., <2 ft)	XX	___	___	PCE, MIBK, DCE, TCE, TCA, heavy metals, VC
Subsurf. Soil (e.g., >2 ft)	XX	___	___	PCE, MIBK, DCE, TCE, TCA, heavy metals, VC
				All at levels well above MCL/PRGs - see RFA
Surface Water	___	XX	___	PCBs, ammonia (non-RCRA)
Sediment	___	XX	___	PCBs, ammonia (non-RCRA)
Air (indoors, Air _{in})	___	XX	___	None detected
Air (outdoors, Air _{out})	___	XX	___	None detected

If yes (for any media) - continue after identifying key contaminants in each "contaminated" medium, citing appropriate "levels" (or provide an explanation for the determination that the medium could pose an unacceptable risk), and referencing supporting documentation.

Rationale and Reference(s): See CERCLA record - there are several plumes and hot spots which are actively being pursued due to their levels being above health-based limits.

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3. Are there **complete pathways** between “contamination” and human receptors such that exposures can be reasonably expected under the current (land- and groundwater-use) conditions?

Summary Exposure Pathway Evaluation Table - Potential Human Receptors (Under Current Conditions)

<u>“Contaminated” Media</u>	Res.	Worker	Const.	Tresp.	Recreat.	Food*
Groundwater	no	no	no	no	no	no
Soil (surface, e.g., <2 ft)	no	no	no	no	no	no
Soil (subsurface e.g., >2 ft)	no	no	no	no	no	no
Surface Water	_____	_____		_____	_____	_____
Sediment	_____	_____		_____	_____	_____
Air (indoors, Air_m)	_____	_____				
Air (outdoors, Air_{out})	_____	_____	_____	_____		

Instructions for Summary Exposure Pathway Evaluation Table:

1. Strike-out specific Media including Plausible Receptors’ spaces for Media which are not “contaminated”) as identified in #2 above.
2. enter “yes” or “no” for potential “completeness” under each “Contaminated” Media -- Human Receptor combination (Pathway).

Note: In order to focus the evaluation to the most probably combinations some potential “Contaminated” Media - Human Receptor combinations (Pathways) do not have check spaces (“_____”). While these combinations may not be probable in most situations they may be possible in some settings and should be added as necessary.

XXXX If no (pathways are not complete for any contaminated media-receptor combination) - skip to #6, **and enter “YE” status code**, after explaining and/or referencing condition(s) in-place, whether natural or man-made, preventing a complete exposure pathway from each contaminated medium (e.g., use **optional** Pathway Evaluation Work Sheet to analyze major pathways).

_____ If yes (pathways are complete for any “Contaminated” Media - Human Receptor combination) - continue after providing supporting explanation.

_____ If unknown (for any “Contaminated” Media - Human Receptor combination) - skip to #6 and enter “IN” status code

Rationale and Reference(s) : **Groundwater** is under institutional control, either by legal wellhead restrictions (western part of facility) or formal notice to homeowners who, while having wells, are on city water. There is no agricultural use of the contaminated aquifer. **Shallow soil** exposure is controlled by written procedures and restrictions on movement of any soil on the site. The site is fenced to preclude trespassing. There are no recreational uses of the facility. **Deep soil** exposure is controlled by written procedures and restrictions on movement of soil during construction. There are no agricultural uses of the facility.

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6. Check the appropriate RCRIS status codes for Human Exposures EI event code CA725, and obtain Supervisor (or appropriate Manager) signature and date on the EI determination below (and attach appropriate supporting documentation as well as a **map** of the facility):

XXX YE - Yes, "No Current Human Exposures" (of concern) can be verified. Based on a review of the information contained in this EI Determination, "No Current Human Exposures" (of concern) are expected at the Ormet-Wah Chang facility, EPA ID # ORD 05095 5848, located at Millersburg, Oregon under current and reasonably expected conditions. This determination will be re-evaluated when the Agency/State becomes aware of significant changes at the facility.

_____ NO - "Current Human Exposures" (of concern) can be expected.

_____ IN - More information is needed to make a determination.

Completed by (signature) _____ Date _____
 (print) Kevin Schanilec _____
 (title) EPA CA Project Manager _____

Supervisor (signature) _____ Date _____
 (print) Jamie Sikorski _____
 (title) RCU Manager _____

Locations where References may be found:

RCRA and CERCLA site files

Contact telephone and e-mail numbers

(name) Kevin Schanilec _____
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(e-mail) schanilec.kevin@epa.gov

FINAL NOTE: THE HUMAN EXPOSURES EI IS A QUALITATIVE SCREENING OF EXPOSURES AND THE DETERMINATIONS WITHIN THIS DOCUMENT SHOULD NOT BE USED AS THE SOLE BASIS FOR RESTRICTING THE SCOPE OF MORE DETAILED (E.G., SITE-SPECIFIC) ASSESSMENTS OF RISK.